

Rachael D. Lamkin (SBN 246066)
Karan Singh Dhadialla (SBN 296313)
BAKER BOTTS L.L.P.
101 California Street, Suite 3200
San Francisco, California 94111
Phone: (415) 291-6200
Fax: (415) 291-6300
rachael.lamkin@bakerbotts.com
karan.dhadialla@bakerbotts.com

Attorneys for Defendant, NETFLIX, INC.

Additional counsel listed on signature page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

**DEFENDANT NETFLIX, INC.'S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE A NOTICE OF
SUPPLEMENTAL EVIDENCE IN
SUPPORT OF ITS MOTION TO JOIN AIPI**

Judge: Hon. Jon S. Tigar
Date: January 25, 2024
Time: 2:00 p.m.
Crtrm: 6 – 2nd Floor

**DEFENDANT NETFLIX, INC.'S ADMINISTRATIVE MOTION FOR LEAVE
TO FILE A NOTICE OF SUPPLEMENTAL EVIDENCE
IN SUPPORT OF ITS MOTION TO JOIN AIPI**

1 On November 6, 2023, Netflix filed a Motion To Join AiPi, LLC. Dkt. No. 217. AiPi filed
 2 an Opposition on November 24, 2023 and Netflix filed its Reply in support of its Motion on
 3 December 1, 2023. Dkt. Nos. 233, 242. After December 1, 2023, Mr. Ramey and representatives of
 4 AiPi have submitted filings in other matters that are relevant to the analysis of this Court's
 5 jurisdiction over AiPi. Netflix seeks permission to file three (3) of said pleadings as supplemental
 6 evidence of this Court's jurisdiction over AiPi.

7 In short, these filings evidence that AiPi hired William Ramey across at least ninety (90)
 8 cases, including this case, and that AiPi appears to have the authority to command Mr. Ramey to
 9 take actions, and to hire and fire Mr. Ramey. They also expressly identify this case as part of the
 10 AiPi/Ramey business relationship. Both are uniquely relevant to this Court's analysis of whether it
 11 has jurisdiction over AiPi given AiPi's participation in this lawsuit. *See* Reply, Dkt. No. 242, at
 12 3:24-7:19. For example, on December 14, 2023, Mr. Ramey filed an email with the Colorado
 13 District Court wherein Mr. Morehouse, an owner of AiPi, commands Mr. Ramey: "Please stop
 14 reaching out to my clients. It's going to cause harm that we'll need to address. . . . I recommend that
 15 you withdraw from all matters except Valjakka, Pedersen, and Ward – but let's discuss first." Exh.
 16 A, at 1. By way of second example, in that same matter, AiPi's counsel, Joe Zito explained, "AiPi
 17 asked Mr. Zito to take a look at a number of cases being handled by Mr. Ramey and to recommend
 18 appropriate actions and to address any concerns. Mr. Zito undertook a review of approximately
 19 ninety Ramey cases. Mr. Zito made appearances in approximately sixty cases and shut down about
 20 two dozen of those cases." Exh. B, at 2-3. Mr. Zito also told that court, "AiPi [is] a patent prosecution
 21 support and litigation support company that dabbles in patent funding[.]" *Id.*, at 2.

22 Netflix asks the Court for permission to file the attached three (3) exhibits in a Notice Of
 23 Supplemental Evidence.¹

24 ///

25
 26 ¹ The District of Colorado court has ordered Joe Zito to respond to a declaration submitted by
 27 William Ramey on or before January 8, 2024. *See California Innovations, Inc. v. Ice Rover, Inc.*,
 28 Case No. 1:22-cv-01986-RM-NRN, Dkt No. 65. That filing may contain further relevant
 information. Netflix will seek permission to submit that filing if relevant. Further, to minimize the
 burden on this Court, Netflix has sought to submit only a few of the many potentially relevant
 documents from the other AiPi/Ramey matters. Netflix will file the complete set of documents
 associated with Exhibits A-C upon this Court's request.

1
2 Dated: December 19, 2023

Respectfully submitted,

3 /s/ Rachael D. Lamkin

4 Rachael D. Lamkin (SBN 246066)
5 Karan Singh Dhadialla (SBN 296313)
6 BAKER BOTTS L.L.P.
7 101 California Street, Suite 3200
8 San Francisco, CA 94111
9 Tel: (415) 291-6200
10 Fax: (415) 291-6300
11 rachael.lamkin@bakerbotts.com
12 karan.dhadialla@bakerbotts.com

13 Sarah E. Piepmeier, Bar No. 227094
14 SPiepmeier@perkinscoie.com
15 Elise S. Edlin, Bar No. 293756
16 EEdlin@perkinscoie.com
17 PERKINS COIE LLP
18 505 Howard Street, Suite 1000
19 San Francisco, California 94105
20 Telephone: +1.415.344.7000
21 Facsimile: +1.415.344.7050

22 Janice L. Ta (appearance pro hac vice)
23 JTa@perkinscoie.com
24 PERKINS COIE LLP
25 405 Colorado Street Suite 1700
26 Austin, Texas 78701
27 Telephone: +1.737.256.6100
28 Facsimile: +1.737.256.6300

Jassiem N. Moore (appearance pro hac vice)
JassiemMoore@perkinscoie.com
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Telephone: +1.206.359.8000
Facsimile: +1.206.359.9000

Brianna Kadjo, Bar No. 303336
BKadjo@perkinscoie.com
PERKINS COIE LLP
1900 Sixteenth Street, Suite 1400
Denver, Colorado 80202-5255
Telephone: +1.303.291.2300
Facsimile: +1.303.291.2400

Attorneys for Defendant, NETFLIX, INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28